

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	Chapter 15
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., ¹)	Case No. 22-10630 (JTD)
Debtor in a Foreign Proceeding.)	

**NOTICE OF *SECOND AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 15, 2022 AT 4:00 P.M. (ET)**

***AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THE HEARING HAS
BEEN CANCELLED WITH PERMISSION FROM THE COURT***

I. MATTER GOING FORWARD:

1. Notice of Filing of Amended Bidding Procedures Motion and Blackline [[Docket No. 103](#) – filed November 29, 2022]

Objection / Response Deadline for Bidding Procedures Motion:
November 10, 2022 at 4:00 p.m. (ET)

Objection/Response Deadline for Amended Bidding Procedures Motion:
December 13, 2022 at 5:00 p.m. (ET)

Objections / Responses Received:

- A. Letter Objection of Stansilav Bozhenko [[Docket No. 125](#) – filed December 14, 2022]
- B. Informal comments from the Office of the United States Trustee (the “U.S. Trustee”)

Related Documents:

- i. Foreign Representative’s Motion for Entry of Orders: (I) (A) Authorizing and Approving Bidding Procedures Relating to the Sale of Chapter 15 Debtor’s Equity Interests in Crédito Real USA Finance, LLC, (B)

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

² **Amended items appear in bold.**

Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (III) Granting Related Relief [[Docket No. 95](#) – filed October 26, 2022]

- ii. Declaration of Robert Wagstaff in Support of Foreign Representative's Amended Motion for Entry of Orders Pursuant to 11 U.S.C. §§ 105(a) and 1519(a): (I) (A) Authorizing and Approving Bidding Procedures Relating to the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC, (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances and Interests; and (III) Granting Related Relief [[Docket No. 104](#) – filed November 29, 2022]
- iii. Supplemental Declaration of Robert Wagstaff in Support of Foreign Representative's Amended Motion for Entry of Orders Pursuant to 11 U.S.C. §§ 105(a) and 1519(a): (I)(A) Authorizing and Approving Bidding Procedures Relating to the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC, (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (III) Granting Related Relief [[Docket No. 113](#) – filed December 7, 2022]
- iv. Notice of Filing of Revised Bidding Procedures Order and Blackline [[Docket No. 114](#) – filed December 7, 2022]
- v. Order Shortening the Notice and Objection Periods and Waiving Local Rule 9006-1(c)(ii), with Respect to the Amended Bidding Procedures Motion [[Docket No. 120](#) – entered December 8, 2022]
- vi. Notice of Amended Motion and Hearing [[Docket No. 121](#) – filed December 8, 2022]
- vii. Notice of Filing of Further Revised Bidding Procedures Order and Blackline [[Docket No. 126](#) – filed December 14, 2022]
- viii. Foreign Representative's Reply to Letter Objection to the Amended Bidding Procedures Motion [[Docket No. 127](#) – filed December 15, 2022]
- ix. Foreign Representative's Motion for Leave to File Reply in Support of Foreign Representative's Amended Motion for Entry of an Order Pursuant to U.S.C. §§ 105(a) and 1519(a): (I) (A) Authorizing and Approving

Bidding Procedures Relating to the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC, (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (III) Granting Related Relief [[Docket No. 128](#) – filed December 15, 2022]

- x. **Order Granting Foreign Representative's Motion for Leave to File Reply in Support of Foreign Representative's Amended Motion for Entry of an Order Pursuant to U.S.C. §§ 105(a) and 1519(a): (I) (A) Authorizing and Approving Bidding Procedures Relating to the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC, (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (III) Granting Related Relief [[Docket No. 131](#) – entered December 15, 2022]**
- xi. **Certification of Counsel Regarding Revised Bidding Procedures Order [[Docket No. 132](#) – filed December 15, 2022]**
- xii. **Order: (A) Authorizing and Approving Bidding Procedures Relating to the Sale of the Chapter 15 Debtor's Equity Interests in Crédito Real USA Finance, LLC; (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale; and (C) Approving the Form and Manner of Notice Thereof; and (D) Granting Related Relief [[Docket No. 133](#) – entered December 15, 2022]**

Status: **On December 15, 2022, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

Dated: December 15, 2022

Respectfully submitted,

/s/ Amanda R. Steele

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